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Proposed Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re

CHRISTIAN S. RADABAUGH, SR.

Debtor-in-Possession.

Bankruptcy Case No. 18-34244-pcm11

SUPPLEMENTAL DECLARATION OF  
CHRISTIAN S. RADABAUGH, SR.

I, Christian S. Radabaugh, Sr., hereby declare the following under penalty of perjury:

1. I am the Debtor in the above-captioned bankruptcy proceedings.
2. I make this declaration in support of Debtor's Emergency Motion for Authority to Sell Assets Outside the Ordinary Course of Business.
3. I make this declaration based on my personal knowledge, and if called to testify, I would testify as to the facts set forth in this declaration.
4. The remaining 35 head of cattle left at Shasta are not from my more valuable stock, nor are the younger cows that will provide me with long-term use as breeding cattle. As a result, I do not believe that the sale of the 35 head of cattle that were left behind at Shasta will materially impact my business operations, or negatively impact my ability to propose a plan of reorganization. Shasta has told me that they claim an agricultural services lien against all of the cattle that were at the auction yard, for feed and other expenses incurred before and after I filed this bankruptcy case. In

my opinion, if the cattle are not sold at the December 21<sup>st</sup> auction, the costs to be incurred for feed and transportation will outweigh the amount of net proceeds I could possibly expect to receive if the cattle are sold at a later date.

5. As with other sales at Shasta, the sale at Shasta Livestock scheduled for Friday, December 21, 2018 will be an arms-length transaction and will be conducted by Shasta Livestock. I believe the auction process used by the Shasta Livestock Auction Yard is a reasonable process designed to obtain reasonable market value for livestock, and that the sale procedures used by the auction yard are standard for the cattle industry. I believe that the prices that will be obtained for the cattle are fair market prices.

I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND UNDERSTAND THAT IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY OF PERJURY IN THE UNITED STATES.

DATED: December 19, 2018

By: /s/ Christian S. Radabaugh Sr.  
Christian S. Radabaugh, Sr.

## CERTIFICATE OF SERVICE

I certify, under penalty of perjury, that the foregoing **SUPPLEMENTAL DECLARATION OF CHRISTIAN S. RADABAUGH, SR.**, was served on the following parties via the Court's electronic CM/ECF process:

- SARAH FLYNN sarah.flynn@usdoj.gov
- HOWARD M LEVINE hlevine@sussmanshank.com,  
jhume@sussmanshank.com,ecf.howard.levine@sussmanshank.com,howard-levine-5487@ecf.pacerpro.com
- US Trustee, Portland USTPRegion18.PL.ECF@usdoj.gov

The aforementioned was served on the following parties via mail:

Howard Levine  
Sussman Shank LLP  
1000 SW Broadway Ste 1400  
Portland OR 97205  
Fax: 503 248-0130

DATED December 19, 2018.

/s/ Mary Perry  
Mary Perry, Legal Assistant  
Of Attorneys for Debtor